

**From:** Lindsey Weiss Harris  
**Sent:** Tuesday, November 24, 2015 11:55 AM  
**To:** 'Cymrot, Mark'  
**Cc:** Michael S. Kim; 'Moscow, John W.'; 'Levine, Paul M.'  
**Subject:** RE: Browder Deposition

Mark,

Mr. Browder and we can be available for deposition on November 27, December 30 or January 4. This is obviously subject to the availability of the Government. Please let us know your order of preference among those three dates.

Best,

Lindsey Weiss Harris  
+1 212 488 4937

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-----Original Message-----

From: Cymrot, Mark [mailto:MCymrot@bakerlaw.com]  
Sent: Monday, November 23, 2015 12:13 PM  
To: Lindsey Weiss Harris  
Cc: Michael S. Kim; Moscow, John W.; Levine, Paul M.  
Subject: RE: Browder Deposition

Lindsay: As you know, trial is quickly approaching, even with the change in date. If you don't have a firm date by Wednesday morning, we will ask the judge to set a call to resolve the issue.

Mark

-----Original Message-----

From: Lindsey Weiss Harris [mailto:lindsey.weiss.harris@kobrekim.com]  
Sent: Sunday, November 22, 2015 8:14 PM  
To: Cymrot, Mark  
Cc: Michael Kim; Moscow, John W.; Levine, Paul M.  
Subject: Re: Browder Deposition

Mark,

We are working on this. It's been more challenging than we hoped rescheduling business and personal commitments around the holidays. We will revert to you in the next few days with potential dates.

Best,

Lindsey Weiss Harris

+1 212 488 4937<tel:+1%20212%20488%204937>

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On Nov 21, 2015, at 3:35 PM, Cymrot, Mark <MCymrot@bakerlaw.com<mailto:MCymrot@bakerlaw.com>> wrote:

Lindsay: We expect a firm date from Mr. Browder on Monday or we will pursue the issue with the court. As you know, we are approach trial.

Regards

Mark

From: Lindsey Weiss Harris [mailto:lindsey.weiss.harris@kobrekim.com]

Sent: Friday, November 20, 2015 8:46 AM

To: Cymrot, Mark

Cc: Michael Kim; Moscow, John W.; Levine, Paul M.

Subject: RE: Browder Deposition

Mark, attached is our firm's W-9. Please confirm when the check has been sent, and method of delivery.

We are checking with the government, and trying to move things around both Mr. Browder's schedule and our own. Unfortunately, November 23 is not going to work, but we will get back to you regarding scheduling as soon as we are able.

Best,

Lindsey Weiss Harris

+1 212 488 4937

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From: Cymrot, Mark [mailto:MCymrot@bakerlaw.com]

Sent: Wednesday, November 18, 2015 12:53 PM

To: Lindsey Weiss Harris

Cc: Michael S. Kim; Moscow, John W.

Subject: RE: Browder Deposition

Lindsay: Please send me a w-9 and I will send you a check today for the \$10,000. We will be responsible for the other \$10,000 for your travel expenses for this session of the deposition. We have sent the notice of deposition to the Government and not heard any objection.

We would appreciate it if you would confirm the date promptly because there are few working days before trial.

Regards  
Mark

From: Lindsey Weiss Harris [mailto:lindsey.weiss.harris@kobrekim.com]  
Sent: Wednesday, November 18, 2015 11:25 AM  
To: Cymrot, Mark  
Cc: Michael Kim; Moscow, John W.  
Subject: Browder Deposition

Mark,

We have received the Notice of Deposition requesting personal attendance by Mr. Browder at Baker Botts' London Office on Monday, November 23.

We are checking our client's schedule, and our own travel arrangements to London, to see if we can move things around to accommodate this request. We are assuming that this date has already been cleared with the Government on your end? Assuming that is in order, we will revert to you as soon as practicable.

In the meantime, we were wondering whether your client has made the US \$10,000 payment as ordered by the Court? We have not been able to locate any incoming funds but perhaps you have wire transfer receipts on your end. We would appreciate it if you could send that information so we can match up the incoming wire.

Given we are about to incur a similar level of travel expenses for either Michael or me to travel to London, we wanted to make sure that the funds situation is in order. (Incidentally, could you reserve an additional US \$10,000 for travel expenses from your retainer, and confirm that Baker & Hostetler will settle reimbursement from such reserved funds? This would be very helpful in allowing us to progress this.)

Thanks,

Lindsey Weiss Harris  
+1 212 488 4937

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Ge4&m=gtfo75S4QysVdTYAPPjA92sTw8Zg-  
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